

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

TENTH STREET BUILDING
CORPORATION,

Plaintiff

vs.

BP PRODUCTS NORTH AMERICA,
INC. f/k/a and successor to BP OIL
COMPANY f/k/a and successor to
BORON OIL COMPANY and DONALD
TRAPP,

Defendants

) Docket No. 03-359
) (Judge Maurice B. Cohill, Jr.)
) ELECTRONICALLY FILED PLEADING
)
) CONSENT MOTION TO MODIFY
) PRETRIAL DEADLINES
)
) Filed on behalf of: Plaintiff, Tenth Street
) Building Corporation and Defendant, BP Oil
) Company
)
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CONSENT MOTION TO MODIFY PRETRIAL DEADLINES

The parties, through their undersigned counsel, hereby move the Court for an Order extending the pretrial deadlines in this case by forty-five (45) days pending the parties' efforts to resolve the action, and state in support as follows:

1. Plaintiff commenced this action to recover environmental clean-up costs arising from contamination from underground storage tanks.
2. The parties have diligently pursued settlement negotiations and have made significant progress towards a resolution of this case.
3. Plaintiff has extended a settlement proposal which is currently under review and analysis by BP Products North America, Inc. f/k/a and successor to BP Oil Company f/k/a and successor to Boron Oil Company. BP has advised the plaintiff that its analysis of plaintiff's proposal should be complete in the next few weeks.
4. In order to preserve the resources of the parties and facilitate settlement, the parties wish to extend outstanding pretrial deadlines by forty-five (45) days. The parties believe that this extension will allow them sufficient time to determine whether this matter can be concluded without further expense or attention by the Court.

WHEREFORE, the parties respectfully request that the Court enter an Order extending all outstanding pretrial deadlines by forty-five (45) days.

Respectfully submitted,

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